ABRAMS, FENSTERMAN, FENSTERMAN, EISMAN, GREENBERG, FORMATO & EINIGE Attorneys for Defendant New England Motor Freight, Inc. Todd C. Rubenstein (TCR-8884) 1111 Marcus Avenue-Suite 107 Lake Success, New York 11042 516-328-2300X UNITED STATES DISTRICT COURT	ER, LLP
SOUTHERN DISTRICT OF NEW YORK	
FEDERAL INSURANCE COMPANY;	ECF CASE
Plaintiff(s), vs.	
EXEPEDITORS INTERNATIONAL OF WASHINGTON, INC.; EXPEDITORS INTERNATIONAL OCEAN; EXPEDITORS INTERNATIONAL FRANCE SAS; NEW ENGLAND MOTOR FREIGHT, INC.; FED EX TRADE NETWORKS TRANSPORT & BROKERAGE, INC.	Case Number: 07-CV-3166 (PKC)
Defendant(s).	
EXEPEDITORS INTERNATIONAL OF WASHINGTON, INC.; EXPEDITORS INTERNATIONAL OCEAN; EXPEDITORS INTERNATIONAL FRANCE SAS,	ANSWER OF NEW ENGLAND MOTOR FREIGHT TO CROSS- CLAIMS OF FED-EX TRADE NETWORKS TRANSPORT&
Third-Party Plaintiffs,	BROKERAGE, INC.
vs.	
AIR FRANCE; FEDEX TRADE NETWORKS TRANSPORT & BROKERAGE, INC.,	
Third-Party Defendants.	
X	

Defendant, **New England Motor Freight, Inc.,** as and for its Answer to the Cross-Claims asserted by Defendant FedEx Trade Networks Transport & Brokerage, Inc. in its Answer to Plaintiff's Amended Complaint (the "FedEx Answer"), through its attorneys, alleges upon information and belief, as follows:

- 1. Defendant, New England Motor Freight, Inc., denies the allegations against it set forth in paragraph "13" of FedEx's Answer.
- 2. Defendant, New England Motor Freight, Inc., denies the allegations against it set forth in paragraph "14" of FedEx's Answer, and refers all questions of law to this Honorable Court.

WHEREFORE, Defendant, New England Motor Freight, Inc. demands judgment dismissing Plaintiff's claims and all Cross-Claims asserted against it, or otherwise that New England Motor Freight, Inc. be granted judgment on its cross-claims, together with all costs and disbursements of this action, and all other relief this Court deems just and proper.

Dated: Lake Success, New York January 18, 2008

ABRAMS, FENSTERMAN, FENSTERMAN, EISMAN, GREENBERG, FORMATO & EINIGER, LLP Attorneys for Defendant

Attorneys for Defendant

New England Motor Freight, Inc.

By:

Toda C. Rubenstein (TCR-8884) 11 1 Marcus Avenue-Suite 107

Lake Success, New York 11042

516-328-2300

TO: CLYDE & CO US LLP
Christopher Carlsen, Esq.
Attorneys for FedEx Trade Networks
Transport & Brokerage, Inc.
405 Lexington Avenue
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David L. Mazaroli (DM-3929) Attorney for Plaintiff 11 Park Place **Suite 1214** New York, New York 10007-2801 212-267-8480

Badiak & Will, LLP Attorneys for Defendants/Third-Party Defendants **Expeditors** 106 Third Street Mineola, New York 11501 516-877-2225

McDermott & Radzik, LLP William R. 'Connor, II, Esq. Attorneys for Air France Wall Street Plaza 88 Pine Street 21st Floor New York, New York 10005 212-376-6400

All other parties via ECF

CERTIFICATION

Document 32

I hereby certify that the within Answer was served upon the following:

CLYDE & CO US LLP Christopher Carlsen, Esq. Attorneys for FedEx Trade Networks Transport & Brokerage, Inc. 405 Lexington Avenue New York, NY 10174

David L. Mazaroli (DM-3929) Attorney for Plaintiff 11 Park Place **Suite 1214** New York, New York 10007-2801 212-267-8480

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McDermott & Radzik, LLP William R. 'Connor, II, Esq. Attorneys for Air France Wall Street Plaza 88 Pine Street 21st Floor New York, New York 10005 212-376-6400

Todd C. Rubenstein (TCR-8884)

Dated: Lake Success, New York January 18, 2008